

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Modernizing the E-Rate) WC Docket No. 13-184
Program for Schools and Libraries)

COMMENTS BY CAPISTRANO UNIFIED SCHOOL DISTRICT
RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING

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Description of District

All staff in Capistrano Unified School District are committed to the belief that children will learn, that children will learn more today than yesterday, and that they will learn more tomorrow than today. The District's commitment to the more than 53,000 students entrusted to its care remains steadfast. Our commitment to instructional excellence drives the mission of our nearly 4,000 employees.

Founded in 1965, Capistrano Unified encompasses 195 square miles in seven cities and a portion of the unincorporated area of Orange County. With 55 campuses, it is the largest employer in south Orange County. The District includes all or part of the cities of San Clemente, Dana Point, San Juan Capistrano, Laguna Niguel, Aliso Viejo, Mission Viejo and Rancho Santa Margarita, and the communities of Las Flores, Coto de Caza, Dove Canyon, Ladera Ranch, and Wagon Wheel.

The District is governed by a seven-member Board of Trustees, which generally meets twice monthly at the Capistrano Unified School District (CUSD) Education Center, 33122 Valle Road, San Juan Capistrano.

Summary of Position

The Capistrano School District suggests that a maximum discount of 70% be established for Priority I and Priority II funding. It is our belief that districts that have to invest larger sums of their capital into projects will take care to spend only as necessary on those projects. The district also suggests that only 3 discount levels should exist, at 70%, 55%, and 40%. The district suggests that each of these funding levels should have an opportunity to apply for priority II funding on a rotating basis, ensuring that all students in all districts have an opportunity to take advantage of the federal E-Rate funding rather than only certain populations of students always receiving the greatest advantage. The district also believes that the total funding “ask” that each district may seek should be capped utilizing a formula with a base rate per ADA multiplied by the district average discount rate. A rate similar to \$115 per ADA multiplied by the discount rate of the district would be equitable as a cap. The district believes that E-Rate funding should be raised to accommodate the maximum of this cap each year. The district feels that the E-Rate program must simplify the application process while increasing transparency during the PIA review process.

Outside of E-Rate funding, the district would like to see a separate funding program that communities could apply for that would provide network and wireless infrastructure for communities and students when they leave our campus every day. A C-Rate or Community program would benefit the many students who do not have access at home.